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February 28, 2006

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

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2006 FEB 28 PM 3:45
SC PUBLIC SERVICE
COMMISSION

**Re: Revisions to 26 S.C. Code Ann. Regs. 103-600 (1976 & Supp. 2005) –
Telecommunications Utilities
Docket No. 2005-347-C**

Dear Mr. Terreni:

I am writing on behalf of the South Carolina Telephone Coalition ("SCTC") to provide some brief comments on the Commission's proposed revisions to Article 6 of the Commission's regulations, as published in the State Register on January 27, 2006.

First, regarding R. 103-612(1), we respectfully request that the Commission consider requiring that the annual reports filed by telephone utilities in South Carolina be standardized. While we recognize that additional information may be needed from the telephone utilities for specific purposes (e.g., rate of return regulation), we believe that additional information can and should be obtained through the audit and inspection process, and that the publicly-filed annual reports for all telephone utilities should be uniform. This will ensure consistent treatment of similarly-situated companies.

Second, we respectfully request that the Commission consider further revisions to R. 103-620(e), as recommended in the proposal submitted by the Office of Regulatory Staff on October 25, 2005. The proposed language would read as follows:

Notify its customers that the telephone utility is under the jurisdiction of the Commission and that its customers may, if necessary, seek assistance from ORS regarding the telephone utility's regulated operations or file a formal complaint with the Commission regarding an unresolved dispute involving the telephone utility's regulated operations.

This language would require each company to provide a general notice to all of its customers (for example, by publishing the notice in its telephone directory) regarding the complaint procedures of the Commission. The current regulation instead requires the companies to

Charles L.A. Terreni

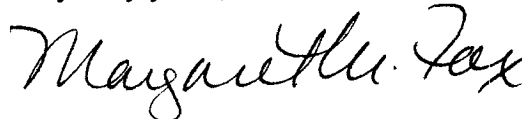
February 28, 2006

Page 2

inform each customer making a complaint that they may bring the complaint to ORS or file a formal complaint with the Commission. The regulation as currently proposed is impractical and inefficient, as most complaints can easily be handled by company customer service representatives without the need to refer the customer to ORS and/or the Commission. The SCTC respectfully submits that a general notice is more appropriate and would better serve the public interest by allowing the companies to resolve complaint matters in the most expeditious manner when possible, while ensuring that all members of the public are appropriately informed regarding their complaint options and procedures.

Thank you for your consideration. Please clock in a copy of this letter and return it with our courier.

Very truly yours,

A handwritten signature in black ink, reading "Margaret M. Fox". The signature is written in a cursive, flowing style.

Margaret M. Fox

MMF/rwm

cc: Florence P. Belser, Esquire
Katie C. Morgan